

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO: 1:23-cv-21619-DPG

ALLISON LAM, on behalf of herself
and all others similarly situated,

Plaintiff(s),
v.

INVESTMENTS 41 LLC d/b/a BLACK MARKET
MIAMI, and ERICK PASSO, individually,

Defendants.

/

**UNOPPOSED MOTION OF JAKE S. BLUMSTEIN TO WITHDRAW
AS COUNSEL OF RECORD**

Pursuant to Southern District of Florida Local Rule 11.1(d)(3), Jake S. Blumstein, Esquire, respectfully seeks to withdraw as counsel of record for Plaintiff, as follows:

1. Local Rule 11.1(d)(3)(a) provides, in pertinent part:

Except as provided by subpart (B) herein, no attorney shall withdraw the attorney's appearance in any action or proceeding except by leave of Court after notice served on the attorney's client and opposing counsel. A motion to withdraw shall include a current mailing address for the attorney's client or the client's new or remaining counsel.

2. As of May 18, 2023, Jake S. Blumstein, Esquire will no longer be employed by the firm USA Employment Lawyers – Jordan Richards PLLC.
3. Accordingly, Jake S. Blumstein, Esquire respectfully requests to withdraw as counsel of record.
4. Notably, the law firm USA Employment Lawyers – Jordan Richards PLLC, and Jordan Richards, Esquire, will continue to represent the Plaintiff.

5. USA Employment Lawyers – Jordan Richards PLLC is still located at 1800 SE 10th Ave, Suite 205, Fort Lauderdale, Florida 33316.
6. Plaintiff has been notified of Jake S. Blumstein's withdrawal.
7. In addition, Defense Counsel (who has not filed a notice of appearance as of the date and time of this filing) has been notified of Jake S. Blumstein's withdrawal and does not oppose this Motion.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(3)

Pursuant to S.D. Fla. L.R. 7.1(a)(3), prior to the filing of the instant motion, the undersigned counsel conferred with Defendants regarding the relief sought herein. Defendants do not oppose this motion.

Date: May 9, 2023

Respectfully Submitted,

**USA EMPLOYMENT LAWYERS –
JORDAN RICHARDS PLLC**
1800 SE 10th Ave, Suite 205
Fort Lauderdale, Florida 33316
(954) 871-0050
Counsel for Plaintiff

By: /s/ Jake S. Blumstein
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Florida Bar No. 108372
JAKE BLUMSTEIN, ESQUIRE
Florida Bar No. 1017746
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document was filed via CM/ECF on May 9, 2023.

By: /s/ Jake S. Blumstein
JAKE S. BLUMSTEIN, ESQUIRE
Florida Bar No. 1017746

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Counsel for Defendants